UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

MARY ANN SIVOLELLA, for the use and benefit of the EQ/Common Stock Index Portfolio, the EQ/Equity Growth PLUS Portfolio, the EQ/Equity 500 Index Portfolio, the EQ/Large Cap Value PLUS Portfolio, the EQ/Global Multi-Sector Equity Portfolio, the EQ/Mid Cap Value PLUS Portfolio, the EQ/GAMCO Small Company Value, and the EQ/Intermediate Government Bond Index Portfolio,

Plaintiff,

VS.

AXA EQUITABLE LIFE INSURANCE COMPANY and AXA EQUITABLE FUNDS MANAGEMENT GROUP, LLC,

Defendants.

GLENN D. SANFORD, et al.,

Plaintiffs,

VS.

AXA EQUITABLE FUNDS MANAGEMENT GROUP, LLC

Defendant.

Civil Action No. 3:11-cv-04194 (PGS)

and

Civil Action No. 3:13-cv-00312 (PGS)

FILED ELECTRONICALLY

JOINT STIPULATION AND [PROPOSED] ORDER REGARDING POST-TRIAL FILINGS

JOINT STIPULATION AND [PROPOSED] ORDER REGARDING POST-TRIAL FILINGS

WHEREAS, the trial in the above-captioned matters was completed on February 25, 2016; and

WHEREAS, on February 25, 2016, counsel for the respective Parties conferred with the Court regarding the deadlines for the Parties to file and serve their post-trial filings;

NOW, THEREFORE, the Parties hereby STIPULATE AND AGREE, by and through their undersigned counsel and subject to the Court's approval, as follows:

- 1. The Parties' respective Post-Trial Proposed Findings of Fact shall be filed and served by March 28, 2016;
- 2. The Parties' respective Responses to Post-Trial Proposed Findings of Fact shall be filed and served by April 15, 2016;
- 3. The Parties' respective Post-Trial Proposed Conclusions of Law shall be filed and served by May 2, 2016;
- 4. The Parties' respective Responses to Post-Trial Proposed Conclusions of Law shall be filed and served by May 16, 2016; and

5. Closing Arguments shall be held on May 23, 2016 at 11:30 am, with Plaintiffs and Defendants each permitted two (2) hours to present their Arguments.

Dated: March 1, 2016

By: /s/ Arnold C. Lakind Arnold C. Lakind SZAFERMAN, LAKIND, BLUMSTEIN & BLADER, P.C. 101 Grovers Mill Road, Suite 200 Lawrenceville, NJ 08648 Tel: (609) 275-0400

Tel: (609) 275-0400 Fax: (609) 275-4511

Attorneys for Plaintiffs

By: /s/ Jonathan M. Korn
Jonathan M. Korn
BLANK ROME LLP
301 Carnegie Center, 3rd Floor
Princeton, NJ 08540
Tel: (609) 750-7700
Fax: (609) 897-7395

Respectfully submitted,

MILBANK, TWEED, HADLEY & McCLOY LLP
James N. Benedict (pro hac vice)
Sean M. Murphy (pro hac vice)
James G. Cavoli (pro hac vice)
Robert C. Hora (pro hac vice)
Andrea G. Hood (pro hac vice)
28 Liberty Street
New York, NY 10005
(212) 530-5000

Attorneys for Defendants AXA

Equitable Life Insurance Company and
AXA Equitable Funds Management

Group, LLC